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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

**Cung Le, Nathan Quarry, Jon Fitch, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

Case No. 5:14-cv-05484-EJD

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES
SHOULD BE RELATED PURSUANT
TO CIVIL L. R. 3-12 AND 7-11**

Luis Javier Vazquez and Dennis Lloyd Hallman,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No. 5:14-cv-05591-PSG

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Civil Local Rules 3-12 and 7-11, Plaintiffs Cung Le, Nathan Quarry, and Jon Fitch (collectively, “Plaintiffs”) submit this administrative motion requesting the Court to consider whether *Vazquez et al v. Zuffa, LLC*, Case No. 5:14-cv-05591-PSG (the “*Vazquez* Action”), filed in this District on December 22, 2014, should be related to the instant action, *Le et al. v. Zuffa LLC*, Case No. 5:14-cv-05484-EJD (the “*Le* action”), filed December 16, 2014.

Civil Local Rule 3-12(a) provides that actions are related when (1) the actions concern substantially the same parties, property, transaction or event; and (2) it appears likely that there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different judges.

The *Vazquez* Action should be related to the instant action because these actions together readily meet the criteria for relation set forth above. Indeed, no substantive difference exists between the allegations and claims for relief in the *Vazquez* Action and in the instant action. The *Vazquez* Action alleges facts and asserts claims involving the same scheme of anticompetitive behavior as that alleged in the *Le* Action. As in the instant case, the *Vazquez* plaintiffs have filed suit to seek recovery on behalf of a two classes: (1) “Bout Plaintiffs”—Elite Professional Mixed Martial Arts (“MMA”) Fighters who fought in at least one bout promoted by defendant Zuffa¹; and (2) “Identity Plaintiffs”—Elite Professional MMA Fighters whose Identity was expropriated or exploited by Zuffa. Identically to the *Le* plaintiffs,

¹ “Zuffa” refers to Zuffa, LLC and its registered trademarks Ultimate Fighting Championship® and UFC®.

1 Plaintiffs Vazquez and Hallman seek class damages and injunctive relief for monopolization under Section
 2 2 of the Sherman Act, 15 U.S.C. § 2. Like the *Le* Plaintiffs, Vazquez and Hamilton allege a class period
 3 running from December 16, 201 to the present.

4 The class period, the material allegations, the relief sought, and the defendant are the same in the
 5 two cases. As such, these two cases will require adjudication of the same questions of law and fact.
 6 Relation of the *Vazquez* Action to the first-filed *Le* Action therefore will promote the conservation of
 7 judicial and party resources in these cases and will ensure efficiency in their prosecution and final
 8 disposition. On the other hand, were the *Vazquez* Action to proceed separately from the *Le* Action, the
 9 Court and the parties would experience unduly burdensome duplication of labor and expenses and would
 10 face the possibility of conflicting results.

11 Therefore, Plaintiffs Cung Le, Nathan Quarry, and Jon Fitch respectfully request that the Court
 12 relate the *Vazquez* Action to the *Le* Action.

13 Dated: December 23, 2014

JOSEPH SAVERI LAW FIRM, INC.

14 By: /s/ Joseph R. Saveri
 15 Joseph R. Saveri

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CERTIFICATE OF SERVICE

I am over 18 years of age and am not a party to these proceedings or any of the actions that are the subject of these proceedings. My business address is 505 Montgomery Street, Suite 625, San Francisco, CA 94111.

I am readily familiar with Joseph Saveri Law Firm's practice for collection and processing of documents for mailing with the United States Postal Service, and that practice is that the documents are deposited with the United States Postal Service with postage fully prepaid the same day as the day of collection in the ordinary course of business.

I am also readily familiar with Joseph Saveri Law Firm's practice for collection and processing of documents for service via e-mail, and that practice is that the documents are attached to an e-mail and sent to the recipient's e-mail account the same day as the date listed on the Certificate of Service.

This certificate of service concerns the following document(s):

ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED PURSUANT TO CIVIL L.R. 3-12 AND 7-11

Pursuant to Civil Local Rule 5-1(h)(2), on Tuesday, December 23, 2014, I served a true and correct copy of the document(s) on the following parties via First Class mail through the U.S. Postal Service and by e-mail:

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General Counsel for Defendant Zuffa, LLC

Date: December 23, 2014

/s/ Kevin E. Rayhill
Kevin E. Rayhill